

**PLAINTIFF'S MOTION
EXHIBIT 19**

1 CURTIS BOSTON

2 walked by and you were standing directly
3 behind the TS desk and Caughey glanced at a
4 book or a log on the desk --

5 MS. PUBLICKER METTHAM:

6 Objection --

7 Q. Was Schoolcraft sitting there?

8 MS. PUBLICKER METTHAM:

9 Objection. Misstates prior testimony.
10 You can answer.

11 MR. KRETZ: Objection.

12 A. He probably was.

13 Q. Was Huffman at the desk?

14 A. Yes.

15 Q. Was there anybody else there?

16 A. I don't recall.

17 Q. Did you say anything to
18 Schoolcraft after Caughey walked by?

19 MS. PUBLICKER METTHAM:

20 Objection. Which time?

21 MR. SMITH: The only that we've
22 been focusing on that she has any
23 recollection so far of.

24 A. Just what I told you. Just what
25 I said that it was unusual. That's all I

1 CURTIS BOSTON

2 said.

3 Q. You told Schoolcraft that?

4 A. That all I recall. That's all I
5 recall saying.

6 MR. SMITH: Can you read back
7 the question and the answer, please.

8 (Record read.)

9 Q. What did Schoolcraft say to you
10 in response?

11 A. I don't remember.

12 Q. Did Schoolcraft ever ask you to
13 write down what your impressions of
14 Caughey's behavior were that day?

15 A. No.

16 Q. Did you ever write down your
17 impressions about Caughey's behavior that
18 day?

19 A. No.

20 Q. Do you maintain a memo book or
21 activity log as a PAA?

22 A. No.

23 Q. On the other occasions, when you
24 saw Caughey walk by the TS desk, where were
25 you?

1 CURTIS BOSTON

2 Q. Can you identify the voices that
3 you heard in the 40 minute excerpt?

4 MS. PUBLICKER METTHAM: Forty
5 second?

6 Q. Forty second excerpt?

7 A. It's so many voices, I could
8 barely hear. You want to play that again.

9 Q. Yeah, I will definitely play it
10 again. Did you hear your voice in that at
11 all?

12 A. Seem like it.

13 Q. Did you hear Officer --

14 A. There's a lot of voices going in
15 there. Had I listened more closely.

16 MR. SMITH: Let's go back 625.00
17 and try it again.

18 (Whereupon, a tape recording was
19 played.)

20 MR. SMITH: Okay, stopping the
21 recording playback at 625.44.

22 Q. Did you hear Officer
23 Schoolcraft's voice in that segment?

24 A. Yes.

25 Q. Did you hear your voice in that

1 CURTIS BOSTON

2 segment?

3 A. Yes.

4 Q. Who else's voice did you hear in
5 that segment?

6 A. Sounds like I hear Sergeant
7 Huffman, but like I said, it's not clear.

8 Q. Did you hear Officer Schoolcraft
9 asking you to write down what you thought
10 made you suspicious?

11 A. Yeah, sound like I heard him say
12 something to that effect there.

13 Q. Do you have a recollection of
14 him saying that or words to that effect to
15 you?

16 A. No, because people say a lot of
17 things in the precinct. I probably was
18 trying just to appease him and be like yeah,
19 all right, okay, okay because, you know, I'm
20 trying to get through the day. You try to
21 go into work, you try not to get personal
22 and I'm trying to get through the day.

23 Q. So sitting here today, you don't
24 have a recollection of Officer Schoolcraft
25 asking you to jot down a note about what

1 CURTIS BOSTON

2 made you feel suspicious; is that right?

3 A. No, I don't have a recollection
4 of that, but I hear it in there.

5 Q. You hear it in there, okay. So
6 sitting here today, you also don't have any
7 reason to believe that's that not what was
8 said to you, right?

9 MS. PUBLICKER METTHAM:

10 Objection.

11 A. Okay. I didn't say that. I
12 said I don't recall that. I just don't
13 recall it.

14 Q. No, I understand that you don't
15 recall that, but after listening to the
16 recording, can you identify for me any
17 reason why -- let me rephrase that.

18 After listening to the recording
19 and hearing the words, can you identify any
20 reason for why you can point to a reason for
21 -- no, that's not working out either.

22 Do you have any reason to doubt
23 that Officer Schoolcraft didn't ask you to
24 write down what you felt suspicious about?

25 MR. KRETZ: Objection.

1 CURTIS BOSTON

2 MS. PUBLICKER METTHAM:

3 Objection.

4 A. I don't have any reason to
5 doubt. I just don't remember.

6 Q. I don't have any more questions
7 about that.

8 One more question is when was
9 your next regular day of work?

10 A. You're talking about right now?

11 Q. No, I'm sorry. No, still in
12 October 31, 2009. May we never leave it.

13 A. Okay. So that was on Saturday.
14 Okay. My next regular day of work would
15 have been that Tuesday because I was off for
16 the next two days.

17 Q. When you got back to work that
18 day, did anybody tell you what happened to
19 Schoolcraft?

20 A. Anybody tell me -- I don't
21 recall. I know that he wasn't there and I
22 just -- it's really it's just a blur to me.
23 Maybe somebody could have said something to
24 me. I'm not saying that they didn't, you
25 know, because if somebody not in the